

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHRISTMAS TREE SHOPS, LLC, *et al.*,¹

Debtors.

Chapter 7

Case No. 23-10576 (TMH)

(Jointly Administered)

GEORGE L. MILLER, in his capacity as Chapter
7 Trustee of CHRISTMAS TREE SHOPS, LLC
et al.,

Plaintiff,

vs.

A1 JANITORIAL CLEANING SERVICE,

MEDFORD WELLINGTON SERVICE CO.,
INC.

R.R. DONNELLEY & SONS COMPANY,

SCHNEIDER NATIONAL INC.,

SPANGLER CANDY CO.,

STAPLES BUSINESS ADVANTAGE,

TATE'S WHOLESALE LLC

WILTON INDUSTRIES, INC.,

Defendants.

Adv. Proc. No. 25-50823 (TMH)

Adv. Proc. No. 25-50856 (TMH)

Adv. Proc. No. 25-50859 (TMH)

Adv. Proc. No. 25-50863 (TMH)

Adv. Proc. No. 25-50868 (TMH)

Adv. Proc. No. 25-50870 (TMH)

Adv. Proc. No. 25-50874 (TMH)

Adv. Proc. No. 25-50884 (TMH)

¹ The Debtors in these chapter 7 cases and the last four digits of each Debtor's U.S. tax identification number are as follows: Christmas Tree Shops, LLC (1207), Handil, LLC (1150), Handil Holdings, LLC (2891), Salkovitz Family Trust 2, LLC (8773), and Nantucket Distributing Co., LLC (1640).

**CERTIFICATE OF NO OBJECTION REGARDING
SECOND OMNIBUS MOTION OF GEORGE L. MILLER,
CHAPTER 7 TRUSTEE, TO APPROVE SETTLEMENT AGREEMENTS**

The undersigned proposed counsel for George L. Miller, chapter 7 trustee (the “Trustee”) to the estates of the above-captioned debtors (the “Debtors”) hereby certifies that:

1. On October 23, 2025, the Trustee filed the *Second Omnibus Motion of George L. Miller, Chapter 7 Trustee, to Approve Settlement Agreements* [Docket No. 927; Adv. Proc. No. 25-50823 Docket No. 9; Adv. Proc. No. 25-50856 Docket No. 9; Adv. Proc. No. 25-50859 Docket No. 6; Adv. Proc. No. 25-50863 Docket No. 11; Adv. Proc. No. 25-50868 Docket No. 7; Adv. Proc. No. 25-50870 Docket No. 11; Adv. Proc. No. 25-50874 Docket No. 8; Adv. Proc. No. 25-50884 Docket No. 6], (the “Motion”).

2. Pursuant to the *Notice of Second Omnibus Motion of George L. Miller, Chapter 7 Trustee, to Approve Settlement Agreements* [Docket No. 927-1], objections to entry of an order granting the Motion were due no later than November 6, 2025 at 4:00 p.m. Eastern Time (the “Objection Deadline”).

3. The undersigned has caused the U.S. Bankruptcy Court’s docket in this case to be reviewed, and no answer, objection or other responsive pleadings to the Motion appears thereon. Additionally, no objections to the Motion have been received by the undersigned counsel.

4. Attached hereto as **Exhibit A** is a proposed form of order approving the Motion (the “Proposed Order”).

5. Accordingly, the Trustee requests that the Proposed Order attached hereto as **Exhibit A** be entered at the Court’s earliest convenience.

Dated: November 10, 2025

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

Bradford J. Sandler (DE Bar No. 4142)

Peter J. Keane (DE Bar No. 5503)

Edward A. Corma (DE Bar No. 6718)

919 North Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19899-8705 (Courier 19801)

Telephone: (302) 652-4100

Facsimile: (302) 652-4400

Email: bsandler@pszjlaw.com

pkeane@pszjlaw.com

ecorma@pszjlaw.com

Counsel to George L. Miller, Chapter 7 Trustee